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April 19, 2005

Ms. Diane Sheridan
 Chemical Control Division
 Mail Code 7405M
 Ariel Rios Building
 1200 Pennsylvania Avenue, N. W.
 Washington, DC 20460

INVISTA S.à r.l.
 INVISTA Building
 4123 East 37th Street North
 Wichita, KS 67201

(316) 828-1342 Tel
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Re: Notice of Transfer of HPV Commitments

Dear Ms. Sheridan:

INVISTA S.à r.l. requests the transfer of commitments for 26 chemicals under the High Production Volume Program from E. I. du Pont de Nemours and Company to INVISTA S.à r.l. The chemicals are:

Chemical	CAS Number
Cyclohexanol	108-93-0
Hexamethyleneimine	111-49-9
4-Pentenitrile	592-51-8
3-Pentenitrile	4635-87-4
2-Methyl-3-Butenenitrile	16529-56-9
Trans-2-Pentenitrile	26294-98-4
Cis-2-Pentenitrile	25899-50-7
1,5-Cyclooctadiene	111-78-4
1,2-Cyclohexanediamine	694-83-7
2-Methyl-1,5-Pentanediamine	15520-10-2
Reaction Product (Adiponitrile/Hydrogen) High-Boiling Fraction	68411-90-5
Triisopropyl Borate	5419-55-6
Triphenylborane	960-71-4
Sodium Hydroxytriphenylborate	12113-07-4
Acetylene	74-86-2
4-Vinylcyclohexene	100-40-3
Succinic Acid	110-15-6
Glutaric Acid	110-94-1
Adipic Acid	124-04-9
2-Methylglutaronitrile	4553-62-2
Ethylsuccinonitrile	17611-82-4
1,5,9-Cyclododecatriene	4904-61-4
Dimethylsuccinate	106-65-0
Dimethyladipate	627-93-0
Dimethylglutarate	1119-40-0
Reaction Product (Cyclododecanol/Cyclododecanone/Nitric Acid), High-Boiling Fraction	72162-23-3

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The commitments are being transferred from DuPont to INVISTA as a result of the sale of the businesses associated with these chemicals to Koch Industries, Inc. INVISTA S.à r.l. is wholly owned by Koch Industries, Inc.

Except for 4-Vinylcyclohexene, all listed chemicals have had an initial robust summaries submitted and are either waiting for comments, gathering information to respond to your comments or implementing the proposed test plan.

Please feel free to contact Jim Jernigan at jim.jernigan@invista.com with any questions or concerns you may have regarding this request.

Sincerely,

James D. Jernigan, Ph.D.
Product Safety Manager